

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

AMERICAN ASSOCIATION OF UNIVERSITY  
PROFESSORS, ET AL.,

Plaintiffs,

v.

MARCO RUBIO, ET AL.,

Defendants.

Case No. 1:25-cv-10685 (WGY)

**PLAINTIFFS' MOTION TO SEAL**

Pursuant to Local Rule 7.2, Plaintiffs respectfully move the Court for leave to file under seal portions of their Pretrial Brief. The Pretrial Brief and accompanying exhibits contain excerpts from the provisionally-sealed administrative record, Dkt. 106, and from non-public materials provided in discovery.

Plaintiffs will publicly file the non-confidential portions of the Pretrial Brief by 6:00 p.m. EST on Tuesday, July 1, 2025. To the extent that portions of the administrative record are later unsealed or designated non-confidential, Plaintiffs will unseal the relevant portions of the Pretrial Brief by 6:00 p.m. EST on the next business day. The sealed portions of the Pretrial Brief will not be used or disseminated outside of this litigation, nor outside of their intended purpose.

June 27, 2025

Respectfully submitted,

/s/ Ramya Krishnan

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**CERTIFICATE OF SERVICE**

I, the undersigned counsel, certify that on June 27, 2025, I electronically filed the foregoing motion in the United States District Court for the District of Massachusetts using the CM/ECF system. I certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

Dated: June 27, 2025

/s/ Ramya Krishnan

Ramya Krishnan